

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS, WESTERN DIVISION**

**IN RE:**

Louis A. Garcia  
*aka* Luis Garcia

Debtor

Case No.: 18-80736  
Chapter: 7  
Hearing Date: 7/18/18  
Judge Thomas M. Lynch

**NOTICE OF MOTION**

**TO:** Bernard J Natale, Trustee, 1639 N Alpine Road Suite 401, Rockford, IL 61107 by electronic notice through ECF  
Louis A. Garcia, Debtor, 902 Taylor Ridge, Belvidere, IL 61008  
David L. Davitt, Attorney for Debtor, 4023 Charles Street, Rockford, IL 61108 by electronic notice through ECF

\*\*\* SEE ATTACHED SERVICE LIST \*\*\*

PLEASE TAKE NOTICE that on 7/18/18, at 9:30AM, or as soon thereafter as counsel may be heard, I shall appear before the Honorable Judge Thomas M. Lynch, Bankruptcy Judge, in the courtroom usually occupied by him/her at the 327 South Church Street, Rockford, Illinois 61101, room 3100, or before any other Bankruptcy Judge who may be sitting in his/her place and stead, and shall then and there present this Motion of the undersigned, a copy of which is attached hereto and herewith served upon you, and shall pray for the entry of an Order in compliance therewith, at which time you may appear if you so desire.

**PROOF OF SERVICE**

The undersigned, an attorney, hereby certifies that I have served a copy of this Notice along with the attached Motion upon the parties listed above, as to the Trustee and Debtor's attorney via electronic notice on June 14, 2018 and as to all other parties by causing same to be mailed in a properly addressed envelope, postage prepaid, from 7140 Monroe Street, Willowbrook, IL 60527 before the hour of 5:00 PM on June 15, 2018.

/s/ Gloria Tsotsos  
Attorney for Movant

Berton J. Maley ARDC#6209399  
Rachael A. Stokas ARDC#6276349  
Gloria C. Tsotsos ARDC#6274279  
Jose G. Moreno ARDC#6229900  
Peter C. Bastianen ARDC#6244346  
Joel P. Fonferko ARDC#6276490  
Laura A. Hrisko ARDC#6230993  
**Codilis & Associates, P.C.**  
15W030 North Frontage Road, Suite 100  
Burr Ridge, IL 60527  
(630) 794-5300  
**C&A FILE (14-18-04097)**

NOTE: This law firm is a debt collector.

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that I have served a copy of this Notice along with the attached Motion upon the parties listed below, as to the Trustee and Debtor's attorney via electronic notice on June 14, 2018 and as to all other parties by causing same to be mailed in a properly addressed envelope, postage prepaid, from 7140 Monroe Street, Willowbrook, IL 60527 before the hour of 5:00 PM on June 15, 2018.

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/s/ Gloria Tsotsos

Attorney for Movant

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Judge Thomas M. Lynch

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**AMENDED MOTION FOR ENTRY OF AN AGREED ORDER  
VALIDATING SALE “NUNC PRO TUNC”  
AND MOTION TO ABANDON PROPERTY OF THE ESTATE**

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**NOW COMES** QUICKEN LOANS INC., a secured creditor herein, by and through its attorneys, Codilis & Associates, P.C., and moves this Honorable Court for entry of an Agreed Order validating the sale “Nunc Pro Tunc,” and pursuant to 11 U.S.C. §554(b) and F.R.B.P. 6007(b) for an Order abandoning property of the estate, and in support thereof states as follows:

1. This Court has jurisdiction pursuant to 28 U.S.C. §1334 and Internal Operating Procedure 15(a) of the United States District Court for the Northern District of Illinois;
2. The Debtor is indebted to QUICKEN LOANS INC. for which the Movant claims a valid security interest in the property commonly known as 902 Taylor Rdg, Belvidere, IL 61008;
3. This security interest arose from a Note and Mortgage, executed on 8/31/2012, in the amount of \$220,924.00;
4. On 04/30/2018, a short sale was held;
5. The sale price was \$195,000.00 to the buyer Osama Badran;

6. Movant requests entry of an Agreed Order validating the sale “Nunc Pro Tunc” as to proceed with completion of the closing;

7. The Trustee has advised our office that he is not interested in marketing this property. A No-Asset Report was filed on 05/23/2018;

**WHEREFORE,** QUICKEN LOANS INC. prays this Court enter an Agreed Order “Nunc Pro Tunc” validating the sale held on 04/30/2018, and for entry of an Order pursuant to 11 U.S.C. §554(b) and F.R.B.P. 6007(b) abandoning the Trustee’s interest in the above-referenced property, and for such other and further relief as this Court may deem just and proper.

Dated this June 14, 2018.

Respectfully Submitted,

Codilis & Associates, P.C.

By: /s/ Gloria Tsotsos

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**List of Creditors  
BK Case 18-80736**

AFNI  
PO Box 3097  
Bloomington, IL 61702

Berwyn Police Dept -  
Parking Div  
6401 W. 31st St.  
Berwyn, IL 60402

Best Buy Credit Services  
PO Box 78009  
Phoenix, AZ 85062-8009

Capital One Auto Finance  
PO Box 60511  
City of Industry, CA 91716-  
0511

Capital One Auto Finance, a  
division of Capital One  
AIS Portfolio Services, LP  
4515 N Santa Fe Ave. Dept.  
APS  
Oklahoma City, OK 73118

Capital One Bank  
PO Box 6492  
Carol Stream, IL 60197

City of Chicago - Dept of  
Finance  
121 N. LaSalle St. - 7th Floor  
Chicago, IL 60602

Comenity - Carsons  
PO Box 182789  
Columbus, OH 43218

Comenity - Express  
PO Box 659728  
San Antonio, TX 78265-9728

Comenity - Harlem - The  
Roomplace  
PO Box 182789  
Columbus, OH 43218

Comenity - Torrid  
PO Box 659584  
San Antonio, TX 78265-9584

Comenity - Victorias Secret  
PO Box 659728  
San Antonio, TX 78265-9728

Dell Preferred Account  
Payment Processing Center  
P.O. Box 6403  
Carol Stream, IL 60197-6403

Equifax  
ATTN: Bankruptcy Dept  
PO Box 740241  
Atlanta, GA 30374

Experian  
Attn: Bankruptcy Dept.  
PO Box 2002  
Allen, TX 75013

First National Collection  
Bureau, I  
50 W. Liberty St. - Suite 250  
Reno, NV 89501

First National Credit Card  
PO Box 2496  
Omaha, NE 68103-2496

Frontier Communications  
c/o Credit Collection Service  
PO Box 710  
Norwood, MA 02062

Illinois Tollway  
PO Box 5544  
Chicago, IL 60680-5544

Kohls  
PO Box 3115  
Milwaukee, WI 53201-3115

Merrick Bank  
PO Box 660702  
Dallas, TX 75266-0702

Nicor Gas  
P.O. Box 2020  
Aurora, IL 60507-2020

OSF St. Anthony Hospital  
5510 E. State St.  
Rockford, IL 61108

Periodontics of Rockford  
c/o Barrick Switzer Long  
Balsley &  
6833 Stalter Dr.  
Rockford, IL 61108

Quicken Loans Inc.  
PO Box 6577  
Carol Stream, IL 60197-6577

T-Mobile  
PO Box 790047  
Saint Louis, MO 63179-0047

Transunion  
Attn: Bankruptcy Dept.  
PO Box 1000  
Crum Lynne, PA 19022